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July 24, 2020

VIA CM/ECF

The Honorable Denise L. Cote
United States District Court Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Knopf et al. v. Esposito et al.* (“Esposito”), No. 17-cv-5833 (S.D.N.Y.)
Knopf et al. v. Phillips et al. (“Phillips”), No. 16-cv-6601 (S.D.N.Y.)**

Dear Judge Cote,

I am a *pro se* defendant in the above referenced actions and write in response to the Court’s Order dated July 13, 2020, which applies to both cases.

My position is that the unambiguous November 1, 2020 agreement (“Agreement”) drafted by the Knopfs that I provided a copy to the Court in support of my motions to dismiss *Esposito* and *Phillips*, with prejudice, is enforceable and the Court should grant the *sub judice* motions. When the Agreement was executed the *status quo* was that both cases had been dismissed in my favor. The Knopfs have now filed their consent to these dismissals and no party has objected.

I take no position in the other matters Your Honor inquired about but will make myself available as a non-party witness in the event a party wishes to depose me. As the Court is aware, I have already provided multiple affidavits, extensive documentary discovery and have been deposed twice in both state and federal court proceedings concerning matters relevant to *Esposito* and *Phillips*.

If the Court determines the proposed July 31, 2020 remotely held conference in necessary, I shall appear.

Respectfully submitted,



Michael Hayden Sanford

Cc: All parties of record via CM/ECF